IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA **NORTHERN DIVISION**

J.B., a minor child, by and through his next friend, ADDIE WARD, on Behalf of himself and all others similarly situated;

Plaintiff,

CASE NO: 2:06cv00755-MHT VS.

WALTER WOOD, in his individual

capacity,

Defendant.

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA **NORTHERN DIVISION**

J.B., a minor child, by and through his next friend, ADDIE WARD, on Behalf of himself and all others similarly situated;

Plaintiff,

CASE NO: 2:06cv00908-MEF vs.

WALTER WOOD, in his individual

capacity,

Defendant.

PLAINTIFF'S SUPPLEMENTAL FILING IN RESPONSE TO DEFENDANT WALTER WOOD'S MOTION MOTION FOR SUMMARY JUDGMENT

Plaintiff J.B. hereby submits the following exhibit in response to his Motion for Summary Judgment.

Plaintiff hereby submits the following exhibit:

31. Case Action Summary for R.P. v. Department of Youth Services, CV-2002-34; J.N. v. DYS, CV-02-94; C.F. v. Walter Wood, CV-02-119, all in the Circuit Court for Montgomery County, Alabama.

> /s/Robert D. Drummond, Jr. ROBERT D. DRUMMOND, JR. (DRU004) Attorney for Plaintiff

OF COUNSEL:

323 De La Mare Avenue Fairhope, Alabama 36532 (251) 990-6249

> /s/Michael J. Crow MICHAEL J. CROW (CRO039) Attorney for Plaintiff

OF COUNSEL:

BEASLEY, ALLEN, CROW, METHVIN, PORTIS & MILES, P.C. P.O. Box 4160 Montgomery, AL 36103-4160 (334) 269-2343 - Telephone (334) 954-7555 - Facsimile

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of July, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

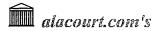
T. Dudley Perry P.O. Box 66 Mt. Meigs, AL 36057

Michael Crow P.O. Box 4160 Montgomery, AL 36103-4160

Robert D. Drummond Attorney at Law 323 De LaMare Fairhope, AL 36532

> /s/Robert D. Drummond, Jr. OF COUNSEL

EXHIBIT # 31



Alabama SJIS Case Detail

Case		"	<u> </u>				
County	03	Case Number	CV 2002 000119 00	JID	J-H	Trial	J
Style	C F A MINOR BY & THE	U NEXT FRI	END MYRTLE FRAZIE	R VS WALT	ER WOOD		
Code	TONG	Туре	NEGLIGENCE- GENERAL	Filed	01102002	Track	
Amount		Status	DISPOSED	Plaintiffs	001	Defendants	001
OND	J-H	Court Action	S (SETTLED) 0325200)3		For	N
Damages-		Damages-		Damages-		No	
Comp		Pun		Gen		Damages	
rial Days		Lien					
Settings							
Date 1	06232003	Que 1	001	Time 1	0900 A	Description	UTRL TRIAL - JURY
Date 2	03132003	Que 2	001	Time 2	0815 A	Description	HEAR HEARING
Date 3	01062003	Que 3	001	Time 3	0845 A	Description	PTRC PRETRIAL CONFERENCE
Date 4	12022002	Que 4	001	Time 4	0900 A	Description	STAT STATUS REVIEW/DKT
Cont Date	11142002	Why				Cont#	01
RevJmt		Admin Date		Why			
Appeal Date	7	CRT		Case	0000 0000	00 00	
BNV1	1	TBNV2		DSDT		DTYP	
Comment 1	FILE SEALED IN VAULT	. SEE ORDE	R.	1		ļ	-
Comment 2							
Party 1							
Party	C 001	Name	C F A MINOR BY & TH	RU HIS NE	XT FRIEND	Туре	INDIVIDUAL
NDX	D/WOOD WALTER	ANAM				JID	J-H
SSN		Address 1	FRAZIER MYRTLE			Sex	
OOB	╡	Address 2				Race	1
Country	US	City	AL 00000 0000			Phone	334 000 0000
Journaly	DRUMMOND ROBERT	<u> </u>			1		1
Atty 1	DEAN	Atty 2		Atty 3		Atty 4]
Atty 5	_	Atty 6		<u> </u>	_	L=	7
ssued	<u> </u>	Туре	<u>]</u>	Reissue	<u></u>	Туре	1
Return		Туре]	Return	_	Туре	<u></u>
Service		Туре]	Serv On		Ву	
\nswer		Туре]	NS Not		NA Not	_
Varrant		Туре]	Arrest			
CACT	S (SETTLED)	Date	03252003	For	N	Ехер	0
AMT	1	Cost	1	Other	1	Satisfied	
Comment	Ħ		u .				_
Party 2			0:				
Party	D 001	Name	WOOD WALTER			Туре	INDIVIDUAL
NDX	P/FRAZIER MYRT	ANAM	1			JID	J-H
SSN			AL DEPT OF YOUTH	SERVICES		Sex	1
OOB	╡	Address 2	MT MEIGS ROAD			Race	Ħ
			MT MEIGS AL 36057	2000		Phone	334 000 0000
Country	US DEPOY TO UDI EV ID	City			7		7
tty 1	PERRY T DUDLEY JR	Atty 2	1	Atty 3		Atty 4	_
Atty 5	_	Atty 6	1	<u> </u>	_	-	7
ssued	_	Туре	1	Reissue	_	Туре	4
Return		Туре	<u> </u>	Return		Туре	_
Service	01152002	Туре	S SERVED PERSON	Serv On	╛	Ву	_
		I		L	_	ALA AL I	
Answer	02202002	Туре	D COMP DENIED	NS Not		NA Not	

Page Page	7	of	2
-----------	---	----	---

		L					
CACT	S (SETTLED)	Date	03252003	For	. N	Exep	0
AMT		Cost	_	Other		Satisfied	
Comment							
Case Act	ion Summary						

Date	Time	Code	Comments	Operator
01012010	1549	TEXT	CASE SEALED 3-25-03. FILE IN VAULT************************************	JAM
01012010	1549	TEXT	****ADD ANY PLEADINGS TO CAS IN VAULT*********	JAM
01012010	1549	TEXT	**********	JAM



Alabama SJIS Case Detail

Case							
County	03	Case	3 CV 2002 000094 00	JID	Ј-Н	Trial	J
Style	IN A MINOR BY & THE	Number	I END KATHY TRUSTY V	S DEDT OF V	/OUTH SEDI	/ICE	<u> </u>
-			NEGLIGENCE-				1
Code	TONG	Туре	GENERAL	Filed	01072002	Track	
Amount		Status	DISPOSED	Plaintiffs	001	Defendants	001
OND	J-H	Court Action	S (SETTLED) 0325200:	3		For	N
Damages-		Damages-		Damages-	İ	No	
Comp Frial Days	-	Pun Lien		Gen		Damages	J
Settings	<u>.</u>	Lien				_	
Date 1	06232003	Que 1	001	Time 1	0900 A	Description	JTRL TRIAL - JURY
Date 2	03132003	Que 2	001	Time 2		Description	HEAR HEARING
Date 3		Que 3		Time 3		Description	
Date 4	12022002	Que 4	001	Time 4	0900 A	Description	STAT STATUS REVIEW/DKT
Cont Date	11142002	Why		_		Cont#	02
RevJmt		Admin Date		Why			
Appeal Date]	CRT		Case	0000 0000		
BNV1		TBNV2		DSDT		DTYP	
Comment 1	FILE SEALED IN VAUL	T. SEE ORDE	ER.				
Comment 2	1						- · · ·
Party 1	T	-	JN A MINOR BY & THR	II NEVT CDIE	ND KATHV	ř	T
Party	C 001	Name	TRUSTY	U NEXT PRIE	MD KAINT	Туре	INDIVIDUAL
NDX	D/YOUTH SERVIC	ANAM				JID	h-H
SSN		Address 1	TRUSTY KATHY			Sex	<u> </u>
OOB	lua .	Address 2				Race	
Country	US BOUND BOREST	City	AL 00000 0000			Phone	334 000 0000
Atty 1	DRUMMOND ROBERT DEAN	Atty 2		Atty 3		Atty 4	
\tty 5	-	Atty 6		D. 1	_		7
ssued	<u>]</u> 1	Туре		Reissue	_	Type	<u> </u>
Return		Туре		Return	╡	Туре	<u> </u>
Service	<u>!</u> i	Туре		Serv On	_	By	<u>]</u> 1
Answer Varrant	 	Type Type		NS Not Arrest	=	NA Not	1
CACT	S (SETTLED)	Date	03252003	For	N	Ехер	lo
MT]	Cost	00202000	Other		Satisfied	<u> </u>
Comment		-501	l	30101	_	Cananeu	1
Party 2	Į						·
arty	D 001	Name	WOOD WALTER			Туре	GOVERNMENT
VDX	P/TRUSTY KATHY	ANAM				JID	J-H
SN			AL DEPT OF YOUTH S	ERVICES		Sex	
ОВ]		MT MEIGS ROAD			Race	j
Country	US	City	MT MEIGS AL 36057 00	000		Phone	334 000 0000
tty 1	TOMPKINS TERRI OLIVE	Atty 2	PERRY T DUDLEY JR	Atty 3]	Atty 4	
tty 5		Atty 6			_	·	•
sued	01082002	Туре	S SHERIFF	Reissue		Туре	
Return		Туре		Return	=	Туре	
	0.4.4.00000		C CEDVED DEDCON	Con. On	=		i
Service	01102002	Туре	S SERVED PERSON	Serv On		Ву	

Warrant	_	Туре		Arrest]		
CACT	S (SETTLED)	Date	03252003	For	N	Exep	0
AMT		Cost		Other]	Satisfied	
Comment						-	
Case Action	Summary						

Date	Time	Code	Comments	Operator
01012010	1552	TEXT	CASE SEALED 3-25-03. FILE IN VAULT************************************	JAM
01012010	1552	TEXT	*****ADD ANY PLEADINGS TO CAS IN VAULT**********	JAM
01012010	1552	TEXT	***********	JAM



Alabama SJIS Case Detail

	ngs Parties		Non Summary (€ Wil				Consolidated CAS
Case		***************************************	_				 -
County	03	Case Number	⊕ CV 2002 000034 00	JID	J-H	Trial	J
Style	RPAMINORBY&THE	ROUGH NEXT		ER VS DEPT	OF YOUT	H SER	
Code	TONG	Туре	NEGLIGENCE- GENERAL	Filed	01042002	Track	
Amount		Status	DISPOSED	Plaintiffs	001	Defendants	
OJID	J-H	Court Action	S (SETTLED) 0325200			For	N
Damages-		Damages-		Damages-		No	
Comp Frial Days	-	Pun Lien	•	Gen		Damages	J
Settings		LICIT					
Date 1	06232003	Que 1	001	Time 1	0900 A	Description	JTRL TRIAL - JURY
Date 2	03132003	Que 2	001	Time 2	0815 A	Description	HEAR HEARING
Date 3		Que 3		Time 3		Description	
Date 4	12022002	Que 4	001	Time 4	0900 A	Description	STAT STATUS REVIEW/DKT
Cont Date	11142002	Why		-		Cont#	02
RevJmt		Admin Date	}	Why			
Appeal Date	_	CRT	1	Case	0000 0000		-
IBNV1	len e oe o e e e e e e e e e e e e e e e	TBNV2		DSDT		DTYP]
Comment 1	FILE SEALED IN VAULT	. SEE ORDER	₹.				
Comment 2	<u> </u>						
Party 1	 	1		BOHGH MEY	/T	<u> </u>	
Party	C 001	Name	R P A MINOR BY & THROUGH NEXT FRIEND			Туре	INDIVIDUAL
NDX	D/YOUTH SERVIC	ANAM				JID	J-H
SSN	_	Address 1	PORTER DORIS			Sex	
OOB		Address 2		<u> </u>		Race	
Country	US BRUNNING BORERT	City	AL 00000 0000		1	Phone	334 000 0000
\tty 1	DRUMMOND ROBERT DEAN	Atty 2		Atty 3		Atty 4	
Atty 5	<u> </u>	Atty 6			•		-
ssued	<u> </u>	Туре		Reissue	<u> </u>	Туре	
Return	<u> </u>	Туре	<u> </u>	Return		Туре	
Service	1	Туре	Į	Serv On	1	Ву	ļ
Answer	1	Туре	Į	NS Not	Į	NA Not	J
Varrant		Туре		Arrest	<u> </u>		
CACT	S (SETTLED)	Date	03252003	For	-	Exep	0
MT]	Cost		Other]	Satisfied]
Comment	REFUND OF OVERPAY	MENT OF FIL	ING FEES			<u></u> .	
Party 2	D 004	IN	MOOD MALTED			-	OOVEDNING:
arty	D 001	Name	WOOD WALTER			Туре	GOVERNMENT
SN	P/PORTER DORTO	ANAM	AL DEDT OF VOUTUR	CEDVICEO		JID	J -H
	4		AL DEPT OF YOUTH S	DEKVICES		Sex	ļ
OOB	J Jue		MT MEIGS ROAD	1000		Race	224 000 0000
Country	US TOMBKING TERRI	City	MT MEIGS AL 36057 0	1000	1	Phone	334 000 0000
atty 1	TOMPKINS TERRI OLIVE		PERRY T DUDLEY JR	Atty 3		Atty 4	
tty 5		Atty 6					
ssued	01072002	Туре	S SHERIFF	Reissue]	Туре	
Return	01152002	Туре	S SERVED PERSON	Return		Type	

Warrant		Туре		Arrest			1		
CACT AMT	S (SETTLED)	Date	03252003	For	N	Exep	0		
AMT		Cost		Other		Satisfied			
Comment									
Case Action S	Case Action Summary								

Date	Time	Code	Comments	Operator
01012010	1548	TEXT	CASE SEALED 3-25-03 - FILE IN VAULT	JAM
01012010	1548	TEXT	*****ADD ANY PLEADINGS ON CAS IN VAULT*********	JAM
01012010	1548	TEXT	**********	JAM